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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GENINE CANNATA, *et al.*,) Case No. 2:10-cv-00068-PMP-(LRL)
)
Plaintiffs,)

vs.)

WYNDHAM WORLDWIDE) **PLAINTIFFS' NOTICE OF MOTION AND**
CORPORATION, a Delaware corporation;) **MOTION TO SEAL DOCKET NO. 106**
JAMES FRIEDMAN, an individual, *et al.*,) **(MOTION TO COMPEL DISCRIM.**
) **COMPLAINTS)**
Defendants.)

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1 Plaintiffs Genine Cannata, Carolyn Davis, Joan E. Lewis, Sheila A. Rhodes,
2 JoEllen Sutherland, Karen Banks, Patricia Calvin, Connie Post, Carla Rains and Lori
3 Wilk, by and through their attorneys of record, hereby move this Court to seal Docket
4 No. 106 (Plaintiffs' Motion to Compel Discrimination Complaints), including all
5 attachments and exhibits thereto. In support of this Motion, Plaintiffs state the following:

6 1. On April, 22, 2010, Defendants filed a motion for a protective order. *See*
7 Dkt. No. 49. Plaintiffs filed a partial opposition to said Motion on May 6, 2010. *See*
8 Dkt. No. 55. This matter is still pending before the Court. As such, no protective order
9 has been entered in this case.

10 2. Accordingly, on February 21, 2011, Plaintiffs filed under seal a Notice of
11 Motion to Compel Discrimination Complaints, a Memorandum of Points and Authorities,
12 a Proposed Order, and an attorney declaration with supporting exhibits. *See* Dkt. No.
13 106.

14 3. Some of the contents of this filing *may* contain confidential information
15 produced by the Defendants in this matter. As a precautionary measure, Plaintiffs filed
16 Docket No. 106 under seal.

17 4. Plaintiffs sent courtesy copies of the Notice of Motion to Compel
18 Discrimination Complaints, Memorandum of Points and Authorities, the Declaration of
19 Felicia M. Medina, Esq, the Proposed Order, and all relevant exhibits to all Defendants of
20 record on February 23, 2011 via overnight mail. (Plaintiffs also sent Defense Counsel an
21 email on February 22, 2011, informing them that Plaintiffs filed a motion under seal and
22 forwarded them the Notice of Motion, the Memorandum of Points and Authorities, the
23 Attorney Declaration, and the Proposed Order).

24 5. Plaintiffs are also sending courtesy copies of Docket No. 106 to the Court.

25 6. Plaintiffs do not wish to file any future Motions under seal. However,
26 Plaintiffs await the Court's further instruction on how to treat confidential information in
27

future filings in the absence of a court order with respect to Docket No. 49 (Defendants' Motion for a Protective Order).

7. Therefore, Plaintiffs respectfully request that in the interim, the Court seal Docket No. 106 (Plaintiffs' Motion to Compel Discrimination Complaints).

8. Plaintiffs reserve their right to move the Court to unseal portions of Docket No. 106 in the future.

Respectfully submitted this 23rd day of February, 2011.

By: /s/ Felicia Medina
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/s/ Jill Sullivan
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/s/ Vincent Aiello
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Attorneys for Plaintiffs

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
DATED: 2-25-11

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Certificate of Service

I certify that service of the foregoing “**PLAINTIFFS’ NOTICE OF MOTION AND MOTION TO SEAL DOCKET NO. 106 (MOTION TO COMPEL DISCRIMINATION COMPLAINTS)**” will be made this 23rd day of February, 2011, by the electronic service of the U.S. District Court to the following:

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By: /s/ Lindsey Yoo
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